

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

ALLY LANDAU et al.,

Plaintiffs,

v.

THE CORPORATION OF HAVERFORD
COLLEGE,

Defendant.

:
:
:
:
:
:
:
:
:
:
:
:

CIVIL ACTION

No. 2:24-cv-02044-GAM

**DECLARATION OF JEROME M. MARCUS IN SUPPORT OF MOTION BY
PLAINTIFFS “HJSB” AND “HJSC” TO PROCEED UNDER PSEUDONYMS**

Pursuant to 28 U.S.C. § 1746, I hereby declare under penalty of perjury that the following is true and correct:

1. I am an attorney admitted to practice in this Court.
2. I represent all of the Plaintiffs in the above-captioned action.
3. I make this declaration to support the Motion by Plaintiffs “HJSB” and “HJSC” to Proceed Under Pseudonyms.

4. Attached hereto as Exhibit A is a true and correct copy of a letter from President Wendy Raymond of Haverford College, titled “A More Inclusive Learning Community” and dated April 9, 2024. This letter is available at <https://www.haverford.edu/president/news/more-inclusive-learning-community>.

5. Attached hereto as Exhibit B is a true and correct screenshot of an article from *The Bi-College News*, titled “The Anti-Defamation League Gives ‘Antisemitism 101’ Workshop at Haverford, Student Activists Stage Disruption,” and dated October 21, 2024. The article is

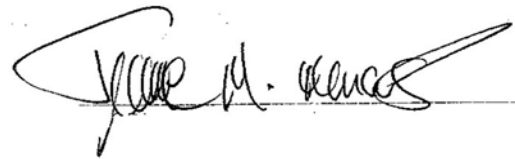
available at <https://bicollegenews.com/2024/10/21/the-anti-defamation-league-gives-antisemitism-101-workshop-at-haverford-student-activists-stage-disruption/>.

6. Attached hereto as Exhibit C is a true and correct screenshot of the “Personally identifiable information” section of Haverford’s Student Records Policy, available at <https://www.haverford.edu/registrar/ferpa#personally-identifiable-information>.

7. Attached hereto as Exhibit D is a true and correct copy of Haverford’s FERPA Guide for Students, Faculty, and Staff, dated March 2, 2017. This guide is available at <https://www.haverford.edu/sites/default/files/Office/Registrar/Haverford-College-FERPA-Guide.pdf>.

8. Haverford’s Commencement Program for May 18, 2024 is publicly available on the internet. Since Haverford has objected to Plaintiffs’ identification of a third-party former student in the Amended Complaint, I am not providing the URL for this document.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 8th day of November 2024.

A handwritten signature in black ink, appearing to read "Jerome M. Marcus", written over a horizontal line.

JEROME M. MARCUS